

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

WILLIAM ROBERT SHAW,

Plaintiff,

v.

Case No. 20-C-1544

RANDY PIONTKOWSKI,

Defendant.

PROPOSED SPECIAL VERDICT

We, the jury, for our verdict, answer the questions submitted to us as follows:

Question 1. Did Plaintiff William Shaw prove that Defendant Randy Piontkowski stopped Plaintiff William Shaw without reasonable suspicion that Plaintiff William Shaw had committed, was committing, or was about to commit a crime on November 16, 2016?

ANSWER: Yes _____ No _____

Continue to Question 2.

Question 2. Did Plaintiff William Shaw prove that Defendant Randy Piontkowski conducted a frisk of Plaintiff William Shaw without reasonable suspicion that Plaintiff William Shaw was armed?

ANSWER: Yes _____ No _____

Continue to Question 3.

Question 3. Did Plaintiff William Shaw prove that Defendant Randy Piontkowski arrested Plaintiff William Shaw without probable cause to believe that he committed a crime?

ANSWER: Yes _____ No _____

If you answered "Yes" to one or more of Question Nos. 1, 2, or 3, continue to Question No. 4. If you answered "No" to Question Nos. 1, 2, and 3, do not answer any more questions.

Question 4. What sum of money will fairly and reasonably compensate Plaintiff William Shaw for any harm he suffered as a result of the violation of his Fourth Amendment rights?

ANSWER: \$ _____

Continue to Question 5.

Question 5. What amount, if any, do you award as punitive damages for the violation of his Fourth Amendment rights?

ANSWER: \$ _____

Dated at Green Bay, Wisconsin this ____ day of February, 2024.

Jury Foreperson